From: <u>Braverman, Carole</u>

To: Nam, Ed; Siegel, Kathryn; Compher, Michael

Subject: FW: Your September 16, 2016, letter to Francesca Grifo re Scientific Integrity

Date: Tuesday, August 08, 2017 12:44:32 PM

fyi

From: Teichman, Kevin

Sent: Tuesday, August 8, 2017 12:30 PM

To: jesse.mcgrath@gmail.com

Cc: Sinks, Tom <Sinks.Tom@epa.gov>; Grifo, Francesca <Grifo.Francesca@epa.gov>; Hawkins, CherylA <Hawkins.CherylA@epa.gov>; Otto, Martha <Otto.Martha@epa.gov>; Braverman, Carole <braverman.carole@epa.gov>

Subject: Your September 16, 2016, letter to Francesca Grifo re Scientific Integrity

Dear Mr. McGrath:

I writing in response to the memorandum you sent Francesca Grifo on September 13, 2016, with the subject "Scientific Integrity failures in Region 5, Air and Radiation Division, Air Monitoring and Analysis Section." Dr. Grifo is out of the office on extended leave, and I am acting in her place to resolve allegations of violations of the US EPA Scientific Integrity Policy (https://www.epa.gov/osa/policy-epa-scientific-integrity).

In your memorandum, you list two "key issues" in your allegation of violations of the scientific integrity policy. In key issue 1, you allege that a Region 5 employee has a conflict of interest, because the employee is auditing a county program where the employee previously worked. Questions of conflict of interest are addressed by the Agency Ethics Officials. I understand from a conversation with Carole Braverman, the Region 5 Deputy Scientific Integrity Official, that Ann Coyle, the Regional Ethics Counsel and Assistant Deputy Ethics Official, has previously conducted an impartiality analysis for the employee in question and found no indication of a financial conflict of interest or any concerns under impartiality standards.

In key issue 2, you allege that the Region 5 Air Monitoring and Analysis Section "has a poor grasp of the fundamentals of monitoring and quality assurance." From a review of the materials you provided, the Scientific Integrity staff interpreted your concern as a case of a differing scientific opinion. According to IV. A. 3. of the US EPA Scientific Integrity Policy, "When an Agency employee substantively engaged in the science informing an Agency policy decision disagrees with the scientific data, scientific interpretations, or scientific conclusions that will be relied upon for said Agency decision, the employee is encouraged to express that opinion, complete with rationale, preferably in writing."

From discussions of your allegation with the Region 5 Deputy Scientific Integrity Official, the Scientific Integrity staff was informed that you were a member of the Office of Air Quality

Planning and Standards Regional Quality Assurance Contacts Workgroup. As a member of the workgroup, you were given the opportunity to share your perspective and concerns regarding the monitoring and quality assurance issues you discuss in your allegation. Therefore, your allegation does not appear to be a violation of the US EPA Scientific Integrity Policy.

If you have any further comments or questions, please feel free to contact me. Since you have left the Agency, I ask that you please acknowledge the receipt of this email, so I can be certain it was received.

Sincerely,

Kevin Teichman
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